

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**RICHARD LOPEZ AND GLORIA  
LOPEZ, ON BEHALF OF  
THEMSELVES AND ALL OTHERS  
SIMILARLY SITUATED,**

**v.**

**PROGRESSIVE COUNTY MUTUAL  
INSURANCE COMPANY AND APRIL  
HAGER**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No. 5:19-CV-00380-FB**

**UNOPPOSED MOTION FOR WITHDRAWAL OF CERTAIN COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant, APRIL HAGER, and files this Motion to Withdraw only Justin T. Woods, Federal ID No. 24061082. Mr. Woods is no longer a member of GOLDMAN & PETERSON, PLLC. Mr. Woods did not retain this file and therefore no longer represents APRIL HAGER in this matter. The Defendant hereby requests that Mr. Woods be removed from the CM/ECF notifications for this matter.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this Motion for Withdrawal of Counsel, be, in all things, granted, and Mr. Woods be removed from this matter.

**CERTIFICATE OF CONFERENCE**

On May 29 and June 1, 2020, pursuant to Local Rule 7(i), counsel for April Hager conferred with Co-Defendant Progressive's counsel and Plaintiffs' counsel regarding this Motion, and each stated they had no objection to the relief being requested.

Respectfully submitted,

By: /s/ Gregory J. Peterson

LARRY J. GOLDMAN

"Attorney in Charge"

Federal ID No. 341

State Bar No. 08093450

GREGORY J. PETERSON

Federal ID No. 996381

State Bar No. 24057580

GOLDMAN & PETERSON, PLLC

10100 Reunion Place, Suite 800

San Antonio, Texas 78216

Telephone: (210) 340-9800

Facsimile: (210) 340-9888

ATTORNEY FOR DEFENDANT APRIL HAGER

AGREED:

By: /s/ Justin T. Woods

JUSTIN T. WOODS

Federal ID No. 2469408

State Bar No. 24061082

Email: [jwoods@sheehyware.com](mailto:jwoods@sheehyware.com)

SHEEHY WARE PAPPAS

112 East Pecan Street, Suite 450

San Antonio, Texas 78205

Telephone: (726) 800-3001

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record are being served in accordance with the Federal Rules of Civil procedure on the 1<sup>st</sup> day of June, 2020 to the following:

Stephen S. Dummitt  
The Carlson Law Firm PC  
618 S.W. Military Dr.  
San Antonio, Texas 78221  
Tel: (210) 923-7700  
Fax: (210) 923-3378  
[sdummitt@carlsonattorneys.com](mailto:sdummitt@carlsonattorneys.com)

*Counsel for Plaintiffs*

Mr. Ian Shelton  
EVERSHEDS SUTHERLAND LLP  
600 Congress Avenue, Suite 2000  
Austin, Texas 78701  
Tel: (512) 721-2714  
Fax: (512) 721-2656  
[ianshelton@eversheds-sutherland.com](mailto:ianshelton@eversheds-sutherland.com)

*Counsel for Progressive County Mutual Insurance  
Company*

John R. Fabry  
The Carlson Law Firm PC  
1717 N. Interstate Highway 35, Suite 305  
Round Rock, Texas 77664  
Tel: (512) 671-7277  
Fax: (512) 238-0275 [jfabry@carlsonattorneys.com](mailto:jfabry@carlsonattorneys.com)

*Counsel for Plaintiffs*

By: /s/ Gregory J. Peterson  
LARRY J. GOLDMAN  
GREGORY J. PETERSON